



Office of General Counsel

ROBERT T. REILLY

General Counsel

Albany

Buffalo

New York

Jennifer N. Coffey

Associate General Counsel

Lena M. Ackerman

Assistant General Counsel

Michael S. Travinski

Associate General Counsel

Jennifer A. Hogan

Associate General Counsel

July 7, 2020

By ECF

Honorable William F. Kuntz, II
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Mushtaq Ahmad v. New York City Department of Education, et al.
Civil Action No. 18-CV-03494 (WFK)(LB)
Our Case No. 263218-F100

Dear Judge Kuntz:

This office represents the United Federation of Teachers and New York State United Teachers (collectively "Union Defendants") in the above-referenced *pro se* matter. Union Defendants respectfully request the Court deem its motion to dismiss the complaint as unopposed and that their motion be granted in its entirety.

Pursuant to Your Honor's order on January 14, 2019, and the Your Honor's Bundling Rule, Union Defendants served Plaintiff with their motion to dismiss on March 15, 2019. Plaintiff sought and received five extensions of time to respond to Union Defendant's motion, from August 16, 2019 until June 26, 2020 (*see* Orders related to Dkt. Nos. 47, 48, 49, 50, 51, 52). As of this date, Union Defendants have not received any opposition from Plaintiff.

Respectfully submitted,

ROBERT T. REILLY

By: /s/ Michael J. Del Piano
Michael J. Del Piano
Of Counsel

MJD/hs

c: Mushtaq Ahmad (by 1st Class Mail)
Plaintiff Pro Se
10 Parliament Drive
New City, New York 10956

Brittany J. Finder, Esq. (by ECF)
New York City Law Department
Attorneys for DOE Defendants
100 Church Street, Room 2-315
New York, New York 10007